

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

FILED
DEC 12 2003
dm
Deputy Clerk

UNIMED PHARMACEUTICALS,
INC.,
a Delaware Corporation, and
LABORATORIES BESINS
ISCOVESCO,
a Delaware Corporation,

Plaintiffs,

v.

PADDOCK LABORATORIES, INC.,
a Minnesota Corporation,

Defendant.

Civil Action No.

File No. 1:03-CV-2503-TWT

DEFENDANT'S RULE 26 DISCLOSURES

Pursuant to Fed. R. Civ. P. 26(a)(1), defendant Paddock Laboratories, Inc.

("Paddock") hereby provides the following initial disclosures.

- A. The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.**

Mary Beth Erstad
Director of New Product Development
Paddock Laboratories, Inc.
3940 Quebec Ave. No.
Minneapolis, MN 55427
(763) 546-4676

Paddock believes Ms. Erstad has knowledge regarding the development of the testosterone gel drug product at issue.

Maureen Rath
Manager Formulation
Paddock Laboratories, Inc.
3940 Quebec Ave. No.
Minneapolis, MN 55427
(763) 546-4676

Paddock believes Ms. Rath has knowledge regarding the development of the testosterone gel drug product at issue.

Pete Zeleny
Formulation Scientist
Paddock Laboratories, Inc.
3940 Quebec Ave. No.
Minneapolis, MN 55427
(763) 546-4676

Paddock believes Mr. Zeleny has knowledge regarding the development of the testosterone gel drug product at issue.

Patrick Johnson
Medtronic Neurological
710 Medtronic Parkway MS-LN175
Minneapolis, MN 55432

Paddock believes Mr. Johnson, who was formerly Paddock's Regulatory Director, has knowledge regarding the preparation and/or review of Paddock's Abbreviated New Drug Application No. 76-744 (hereinafter "the ANDA").

Ronald Nedich, PhD
VP Scientific Affairs
Paddock Laboratories, Inc.
3940 Quebec Ave. No.
Minneapolis, MN 55427
(763) 546-4676

Paddock believes Dr. Nedich has knowledge regarding the development of the testosterone gel drug product at issue and the preparation and/or review of the ANDA.

- B. A copy of, or description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.**

ANDA No. 76-744 -- Paddock has in its possession a complete copy of the ANDA.

R & D Documents -- Paddock has in its possession R&D documents regarding the development of the testosterone gel drug product at issue.

FDA Correspondence -- Paddock has in its possession documents reflecting correspondence with the FDA regarding the ANDA.

Prior Art -- Paddock has in its possession prior art references that may bear on the validity of one or more claims of the patents-in-suit.

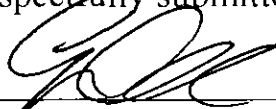
- C. A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.**

Not applicable.

- D. For inspection and copying as under Rule 34 any insurance agreement under which any such person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

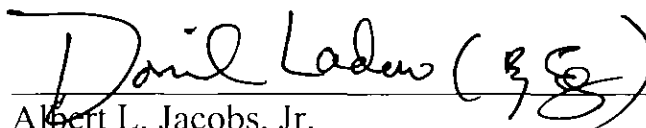
Paddock has no such insurance policies.

Respectfully submitted,



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Paddock Laboratories, Inc.

Dated: December 12, 2003

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing DEFENDANT'S RULE 26 DISCLOSURES has been served by First-Class United States Mail, with adequate postage affixed thereto, to all parties hereto addressed as follows:

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190 South La Salle Street
Chicago, Illinois 60603

This 12th day of December, 2003.

A handwritten signature in black ink, appearing to read 'Hayden Pace', is written over a horizontal line.

Hayden Pace
Georgia Bar No. 558595

Counsel for Defendant Paddock
Laboratories, Inc.

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